

STONE  MAGNANINI

COMPLEX LITIGATION

August 26, 2021

VIA ECF

The Honorable Michael A. Hammer
United States District Court
Martin Luther King Building and U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: *United States v. Jobadiah Sinclair Weeks*, Crim. No. 19-cr-877

Dear Judge Hammer:

I am writing the Court to confirm that the undersigned have been retained to represent Mr. Weeks in connection with the pending motion to revoke bail filed by the Government on August 6, 2021. We are in the process of completing our retention to represent Mr. Weeks with other aspects of this matter but have agreed to appear and represent him in this motion. I have separately filed my notice of appearance in the matter. The lawyers representing Mr. Weeks will be myself and David Boies, Esq. and Matthew Schwartz, Esq. of the firm of Boies Schiller & Flexner. I will shortly be filing *pro hac vice* motions on behalf of David Boies and Matthew Schwartz, to have them admitted to this case.

We were only retained for this purpose today and have had limited opportunity to speak to the client. We have not had an opportunity to review the materials on the docket and understand that some materials may be under seal. Accordingly, we are requesting a brief

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extension, in order for the attorneys to educate themselves about the facts of this case in general and the specifics of this particular motion, which seeks to deprive our client of his liberty.

We have conferred with the Government which agrees that we should be permitted time to acquaint ourselves with the details of the case but would prefer that this hearing be held no later than next week. Although we understand the Government's concerns and the fact that there have been some delays, prior to our being retained, we believe that in fairness to Mr. Weeks and to the attorneys, setting a hearing date the week following Labor Day, while in our view a challenging schedule, will at least balance out these various interests. In this regard, as I have informed the Government. I have a long scheduled family vacation commencing on Saturday, August 28, 2021 and concluding on the following Saturday, September 4, which is the only vacation I have had this summer. Accordingly, we are respectfully requesting that the motion and hearing scheduled for tomorrow be adjourned to a date and time convenient to the Court, in the latter part of the week of September 6, 2021.

Also, based on our discussions with the Government, tomorrow's hearing will not go forward on the merits. We would propose that, if the Court is amenable, the hearing scheduled for tomorrow be canceled and the parties rely on written submissions to Your Honor with regard to the appropriate date for the motion to be heard. If the court wishes to proceed with a hearing tomorrow, I have advised the Government that I am scheduled to attend the funeral of the father of a one of my closest friends between 11:00 am and 1:00 pm. The Government has no objection, if the Court wants to proceed with the hearing, to moving the time of the hearing to sometime between 1:00 pm and 3:00 pm or 3:30 pm and 5:00 pm.

We want to assure the Court that we will do everything in our power to expedite this matter and bring it to an orderly conclusion. Keeping in mind, the important interests of our

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client in presenting a vigorous defense. We thank the court for its courtesy in connection with this matter.

Respectfully submitted,



David S. Stone
Senior Managing Partner

cc: Anthony P. Torntore, AUSA
Jamie L. Hoxie, AUSA
Hon. Claire C. Cecchi
David Boies, Esq.
Matthew Schwartz, Esq.